

1 IN THE UNITED STATES DISTRICT COURT RECEIVED  
2 FOR THE SOUTHERN DISTRICT OF NEW YORK SDNY PRO SE OFFICE  
3  
4 D. GEORGE SWEIGERT 2019 NOV 12 AM 10:15  
5 Plaintiff, DOCUMENT  
6 vs. ELECTRONICALLY FILED  
7 JASON GOODMAN, DATE FILED: 11-12-19  
8 Defendant  
9  
10 MOTION FOR LEAVE TO EXTEND TIME  
11 TO RESPOND TO SECOND AMENDED  
12 COMPLAINT  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

Case No.: 1:18-cv-08653-VEC-SDA

MOTION FOR LEAVE TO EXTEND TIME  
TO RESPOND TO SECOND AMENDED  
COMPLAINT

**MOTION FOR LEAVE TO EXTEND TIME TO RESPOND TO SECOND AMENDED  
COMPLAINT**

Defendant, Jason Goodman, Pro Se moves this Honorable Court for an extension of time to file a response to the Second Amended Complaint filed by Plaintiff, D. George Sweigert ("Plaintiff"), and states as follows:

1. The Intervenor Applicant Steve Outtrim is a known associate of Plaintiff. In the past, Outtrim has participated in coordinated activities with Plaintiff intended to disrupt Goodman's business, personal life and legal Defense. In the Virginia suit, (Steele v Goodman 3:17-cv-00601-MHL) Outtrim wrote a declaration in support of Plaintiff's motion to intervene. The motion was denied as the court in Virginia recognized the frivolous nature of their claims and their attempt to abuse the legal process. Outtrim's email of November 7, 2019 represents a demonstration of pattern and practice of frivolous intervention attempts intended to increase these proceedings. This new development causes the Defendant to request additional time to respond.

MOTION FOR LEAVE TO EXTEND TIME TO RESPOND TO SECOND AMENDED COMPLAINT - 1

- 1 2. No party would be prejudiced by the extension.
- 2 3. The time to respond has not expired.

3  
4  
5 WHEREFORE, Defendant, Jason Goodman, hereby requests that the Court enter an  
6 Order (1) granting her Motion for an Extension of Time; (2) providing Defendant with an  
7 extension of time to file his response to the Second Amended Complaint until on or before  
8 November 21, 2019; and (3) awarding Defendant such further relief as the Court deems  
9 appropriate.

1 I hereby attest that the pleadings herein are accurate and true under penalties of perjury.  
2 Further, I hereby attest that the attached exhibits are accurate and true copies of source  
3 documents as described.  
4

5 Signed this 12 day of November 2019  
6



9 Jason Goodman, Defendant, Pro Se  
10 252 7<sup>th</sup> Avenue Apt 6s  
11 New York, NY 10001  
12 (323) 744-7594  
13 [truth@crowdsourcethetruth.org](mailto:truth@crowdsourcethetruth.org)  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

**CERTIFICATE OF SERVICE**

I hereby certify that on November 12, 2019, a true copy of the foregoing was sent via email to the following:

D. George Sweigert  
C/O General Delivery  
Rough & Ready, CA 95975

Signed this 12 day of November 2019



Jason Goodman, Defendant, Pro Se  
252 7th Avenue Apt 6s  
New York, NY 10001  
(323) 744-7594  
truth@crowdsourcethetruth.org